

Bimonthly Records and Information Discussion Group (BRIDG) Meeting Summary

10:00 a.m. – 12:00 p.m., April 21, 2001

FEMA Headquarters, 500 C Street, SW, Washington, DC.

TOPIC: Web Guidance and Recordkeeping and Records Use Project

Approximately 50 people attended the latest BRIDG meeting on April 25, 2001. Michael L. Miller, Director of Modern Records Programs, and Mark Giguere, Records and Information Systems Analyst in Modern Records Programs, spoke about the National Archives and Records Administration's (NARA) current work on a web guidance policy. In addition, Michael Miller provided NARA updates. Lewis Bellardo, Deputy Archivist of the United States, and Susan Cummings, Policy and Communications Staff, presented an update on the *Current Recordkeeping and Records Use within the Federal Government* Project.

In his welcoming address, Mike Miller thanked Tammy Schartel and Muriel Anderson of FEMA for hosting the BRIDG meeting, since the National Archives building in Washington, DC is under construction.

Overview of Major Concepts in the Proposed NARA Web Guidance – Mark Giguere

The following summarizes the main points of Mark's presentation:

History

The NARA web guidance development process began in January 2001 with an interoffice NARA group. In March 2001, an external focus group, including 24 individuals from agency records offices and IT shops, provided feedback on the document. In April 2001, a draft reflecting the work of both the interoffice group and the external focus group was developed for internal NARA review.

Basic Philosophy

The philosophy is to provide a framework to assist agencies in interpreting existing records management rules in the *Code of Federal Regulations* for their web site management.

Audience

The proposed web guidance will be designed with multiple audience groups in mind, including records officers, agency heads, Chief Information Officers (CIOs), IT operations staff, web operations staff, and contractors. The initial guidance is intended to be a high-level framework, similar to NARA's GPEA guidance. It will not be detailed guidance that answers all questions on web management. Instead, it will be a viable framework from which to build solid, substantive guidance in the future. NARA will share the draft web guidance for agency comment. We intend to offer training to accompany the final guidance. As we develop further specific guidance, separate training on those areas will also be available.

Definition of records

The first point discussed was the definition of web records. NARA's view is that web records are Federal records and should be managed accordingly. This includes both posted content and programmatic/operational records that document web activity. It is understood that web content

is constantly changing, and that a variety of identifiable files can be defined as content (html files, embedded files, images, scripts, copyright materials, etc.). It will be the specific agency's decision however, to determine whether items that are duplicated from paper onto a web site will be considered records. Generally, items on the web are considered records, as is information on posting items (owner, date of posting, etc.).

The web guidance will address the roles of various stakeholders. It will identify specific roles and responsibilities that agencies should assign to various parties. The framework covers many topics, such as risk analysis, program level, and records management personnel. However, while individual staff/organizations are targeted with specific responsibilities, it is also understood that many activities require cooperation and agreement.

Related Regulations

In addition to the Federal Records Act (FRA), there are currently several laws and regulations that relate to and affect the web. Some of these are the Government Paperwork Elimination Act (GPEA), the Paperwork Reduction Act (PRA), Computer Security Act, OMB's policy on Cookies, and the Children's Online Protection Act.

Risk

A risk assessment is a valuable tool to determine the adequacy of documentation requirements. Many agencies have already developed internal guidance for conducting risk assessments. NARA's web guidance will build on existing risk assessment policies in agencies.

Scheduling

The web guidance will include a very high level discussion of scheduling, without providing specific scheduling guidelines. We will be seeking your input to assess what scheduling concerns should be raised in the initial high level guidance as well as in the specific, substantive guidance to come out later.

Michael Miller commented on the importance of identifying the risk level of a web site. A simple, static schedule can be developed for a small, simple web site. A larger, more general web site, which also includes a section that is not considered simple dissemination of information, may require a multi-level schedule. This schedule could include one section to deal with the static portion of the web site, and another section to deal with the rest. It is important to consider technical capabilities when scheduling a web site. Most IT shops do not want to break up a web site into pieces that are managed differently. An agency may be forced to keep all web records for the longest period corresponding to the section of the web site identified to have the most risk.

Several agency records officers suggested that the web guidance draft be broken up so that each audience receives specific guidance that outlines their responsibilities. To do this, two records management themes must be addressed: what needs to be done and who has responsibility. NARA may develop two guidance documents, one at a very high level that is directed towards agency heads, and a second that is broken down by the responsibilities for each specific audience. The BRIDG audience was receptive to the idea of two documents. The consensus

was that it would be helpful to define the stakeholders and their responsibilities, but it is also important to give agency heads an overview document that briefly explains the guidance.

Mark and Mike then asked the audience to think of any additional web related records management requirements or issues which are not currently addressed in the CFR but which relate to web site records. The audience raised issues such as formatting, preservation, migration, capturing, future access, and usability for the life for the record.

Web Guidance Questions and Answers

Q. When is the General Records Schedule (GRS) going to be rewritten to include web records?

A. GRS covers administrative records. Most web records are programmatic records. Also, the GRS does cover records in all media, so those web records that are subject to the GRS can be disposed of using the authority of GRS.

Q. Is NARA coordinating this work with CIOs and the CIO Council?

A. As with the GPEA, NARA will ask the CIO Council to comment on the draft guidance.

Q. What about intranet sites?

A. Think about internal sites when conducting your risk analysis. Generally, there will be more applicable GRS authorities for internal sites, as they contain more personnel and office administration files.

Q. Will NARA be asking agency records officers for comment?

A. Yes.

NARA Updates – Michael Miller

- NARA has identified the need to build bridges to the XML community. Watch for this in the future.
- New *Frequently Asked Questions on Imaged Records* and *Frequently Asked Questions on Optical Media* have been posted to the NARA Records Management web site at <http://www.nara.gov/records/faqs/optical.html> and <http://www.nara.gov/records/faqs/imaged/html>.
- A new product explaining the *Records Schedule Review Process* is on the web at <http://www.nara.gov/records/schedule.html>.
- The Web Snapshot project was met with very good agency cooperation. As of April 20, NARA had received approximately 550 submissions. Thank you for all your efforts.
- The upcoming RACO meeting (May 15, 2001) will discuss NARA's current Records Management Application (RMA) pilot.

- The next BRIDG meeting will be held June 26 at the National Archives Building. BRIDG meetings have been tentatively set for September 18 and November 13 at the Department of Energy, Forrestal Building. Please note that the Forrestal Building is located at the same metro stop (L'Enfant Plaza) as the FEMA Building. You will need a temporary badge to attend these meetings, so please arrive early to the meeting. The front desk will have a list of attendees that have registered for the meetings. More information about future meetings will be posted on the NARA records management web site at <http://www.nara.gov/records/>, as well as via Agency Records Officer memos.

Update on Current Recordkeeping and Records Use within the Federal Government Project – Lewis Bellardo and Susan Cummings

Dr. Lewis Bellardo, Deputy Archivist of the United States, began his presentation by thanking agency and NARA staff for their support. Because of this, the project is gathering a great base of knowledge to evaluate NARA progress in records management. He then introduced NARA's current records management project – Records System Analyses (RSA) of agency work processes and records created by those processes.

Susan Cummings, Policy and Communications Staff, spoke of the project's progress to date. The RSA project has been undertaken to investigate the current recordkeeping and records use in the Federal Government. With this information, NARA will then determine where it needs to be in the future to assist agencies with their records management issues. There are two parts to this data collection. First, SRA, the NARA contractor, interviewed CIOs, General Counsels and Inspector General staff, and held focus group consisting of records users and creators. Sixteen agencies participated in this study, and the contractor was overwhelmed with ideas of what works, what doesn't, and suggestions for improvement. The web survey is still available for completion online at <http://surveys.sra.com/login.asp>. (password: recordkeeping) Currently, most of the participants of the web survey have been from the DC metro area.

NARA staff has also begun its phase of the RSA project. To conduct an RSA study, NARA staff visits an agency, and discusses current work processes with agency staff, and the collects information.

The next step in the project is for SRA to enter all the collected data into a relational database to identify trends and issues. Data analysis will begin in June or July, and NARA hopes to conclude by late summer how to use this information to enact change.